



Via ECF

Hon. Sarah L. Cave
United States Magistrate Judge
United States District Court-SDNY
500 Pearl Street, Courtroom 18A
New York, NY 10007

Re: Sydney Hyman v. Andrew Fabbri and Jessica Cohen
Case No. 19-civ. 10506 (AT)
Discovery Issues

September 24, 2021

Dear Honorable Cave:

We represent the Defendants, Andrew Fabbri (“Fabbri”) and Jessica Cohen (“Cohen”)(“the Defendants”), in the above-referenced matter. We are submitting this letter jointly with Counsel for the Plaintiff, Sydney Hyman (“the Plaintiff”), seeking to garner the Court’s approval of the Parties’ stipulations as to certain discovery-related matters.

Please note that the Defendants are, under separate cover, seeking relief that the Parties are not in agreeance.

Counsel for the Parties have agreed as follows:

1. Depositions of the Parties’ experts in this matter can occur until December 15, 2021.¹ This will alter the current expert witness discovery cut-off date from September 28, 2021.
2. The Plaintiff has consented to the reopening of her own deposition, at a date not yet determined, limited to an examination of Plaintiff on the documents and attending issues that have been produced or raised by the Plaintiff since her original deposition on July 26, 2021.
3. The Plaintiff has consented to the ability of the Defendants’ expert, Dr. Salvage, to supplement his report, to comment on any documents produced by the Plaintiff after Dr. Salvage issued his original report.

¹ This date is dependent upon the end date for discovery that the Defendants propose as November 30, 2021.



The Parties have marked disagreements as to other relief the Defendants are seeking. Hence, for the sake of clarity, Defense Counsel will address these issues under separate cover.

Thank the Court in advance for its kind consideration of this matter.

Respectfully Submitted,

/s/ Murad Michael Khan

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Respectfully Submitted,

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The parties' requests at ECF No. 107 are GRANTED, and the Court orders as follows:

1. Expert discovery, including depositions and the disclosure of any supplemental reports to which the parties have agreed, shall be completed by **December 15, 2021**;
2. The parties are permitted to re-open Plaintiff's deposition on the limited topics to which they have agreed. The deposition shall be completed promptly; and
3. The case management conference before Judge Torres scheduled for October 6, 2021 is ADJOURNED to **Tuesday, January 4, 2022 at 10:40 am**. The parties shall file their joint status letter (see ECF No. 61 at 3) by **December 28, 2021**.

The Clerk of Court is respectfully directed to close ECF No. 107.

SO ORDERED 9/27/2021


SARAH L. CAVE
United States Magistrate Judge